UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAUNDRA G. ELION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	**Civ. Action No. 05-0992 (PLF)**
	)	
ALPHONSO R. JACKSON,	)	
Secretary Of Housing And	)	
Urban Development,	)	
	)	
Defendant.	)	
	)	

SUPPLEMENTAL MEMORANDUM DEPOSITION OF INSPECTOR GENERAL

Plaintiff's Supplemental Memorandum in support of her Motion for Non-Monetary Sanctions demonstrated that defendant had withheld a potentially critical e-mail from HUD Inspector General Kenneth Donohue concerning increasing the hiring ceiling in the Office of Audit shortly after plaintiff's former Division was disbanded (Att. A). Based on the Court's ruling about Plaintiff's Motion, plaintiff has arranged to depose four individuals at defendant's expense on Monday afternoon; Assistant Inspector General James Heist, former Deputy Assistant Inspector General Michael Phelps, Deputy Inspector General Michael Stephens, and Financial Audit Division Director Randy McGinnis. In light of the important duties that befall Mr. Donohue, plaintiff respectfully advises the Court that she will not seek to depose Mr. Donahue at this time; and will not do so unless information derived during the depositions of one of the foregoing individuals demonstrates that relevant information can only be derived by taking his deposition. In that event, plaintiff will then seek leave of Court to depose Mr. Donohue.

Respectfully submitted,

//s//
Robert C. Seldon, Esq.
D.C. Bar No. 245100

//s//
Molly E. Buie, Esq.
D.C. Bar No. 483767

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